

P.O. Box 21
Big Bay, MI 49808
November 17, 2012

Susan Hedman
Environmental Protection Agency
WW-16J
17 W. Jackson Blvd
Chicago, Ill 60604-3590

Ms. Hedman

I am writing to you out of concern and urgency for the decision that EPA Region-5 will soon be making with regard to the Marquette County Road Commission's permit for construction of County Road 595, locally known as the Kennecott Haul Road. The most important aspect that I wish you and your advisors to keep in mind is that this should not be a political decision. I understand that you are being hounded by a number of elected and appointed officials at all levels with regard to this project. They continually stress the importance and need for the jobs this road will create. The economics of this issue does not override the scientific evidence and the resulting accumulative effects of this project if it is allowed to proceed. The needs and purpose of this permit are easily refuted by those of us who live here and will bear the negative impacts if this permit proceeds.

I am sure that Tinka Hyde and Melanie Haveman took notice of the political disconnect between our elected officials and the great majority of citizens, who supported the permit objections raised by the EPA, at the hearings held in Marquette, Michigan on August 28, 2012. All elected officials, save two, were in support of the permit and asked the EPA to lift its objections. One official not in support of removing EPA's objections was Powell Township Supervisor, Daryl Wilcox, who noted the negative economic impact that 595 would have on Big Bay and Powell Township, as it is a haul road for Kennecott that does not serve the public's interest. Following one hour and ten minutes of comment by these politicians came support for the EPA objections at a rate close to 2:1 by the people who live here. The support for the objections was actually greater than 2:1 at the hearing, which was demonstrated by the near universal booing of State Senator Casperson when he commented that most people he talked with were in favor of 595. The documented support for the EPA objections would have been greater, but due to the amount of time taken up by the elected officials, many did not have a chance to speak or were discouraged and left. Many more are afraid to speak up for fear of public ridicule or economic reprisals.

The scene that night of the hearing and the playing out of this issue here in Marquette County reminds me of the disconnect between the elected officials and the electorate in West Virginia. The elected officials follow the "company line" rather than the interests of their constituents. The EPA was correct and courageous to stand on the side of people's health and that of the environment with their decision regarding mountaintop removal in the face of staunch political

criticism from those who only look to the next election rather than present and future generations. I urge you to continue to exercise that scientific judgment and departmental courage in the face of the political onslaught you are facing now.

The intent and purpose of 595, as stated in the permit is to: “(1) connect and improve access to a somewhat isolated but key industrial, commercial and recreational area in NW Marquette County to US-41, and (2) reduce truck travel from this area through the county’s population centers.”

This area is a key recreation center because of its remoteness. People are willing to travel farther and spend more money to do so due to the increasing scarcity of such remote areas. A new year round road through the heart of this area would fragment the ecosystem and cause economic damage to the recreation and tourism industry that Big Bay, Powell Township, and many mom and pop shops in Marquette County depend upon. This area already has quick access from emergency services through the Powell Township EMS and Fire Departments. Any trauma or serious injuries from the mine site would have to be transported to Marquette General Hospital (MGH) anyhow, as Bell Memorial Hospital in Ishpeming does not have a trauma unit and is not equipped to handle such emergencies. This is a remote recreational area and those who utilize it accept the responsibility of their decisions. If all remote areas needed improved access for emergency services, we would have no wilderness left. The quickest route to MGH is by way of AAA, 510, and 550. Calling this area a key industrial area is wishful thinking on the part of some at this time. There have been no new reported discoveries of feasible mining activities outside of Eagle Rock. No permits have been filed.

The increased traffic on AAA, 510, and 550 would be negligible when compared to the total amount of traffic already experienced on this route. Rio Tinto has backed down from a claim of 80 trucks a day to 50 trucks a day. This is a little more than 2 per hour. These trucks can travel at night or be spread out in other ways throughout a 24 hour period. This truck traffic from the mine would be less than the current traffic over the last two years as the mine was being built. There are better alternative routes that have not been examined with integrity. If AAA, 510, and 550 are not to be used then the “510, Red Road, Sleepy Hollow, Wolf Lake Road” and the “Mulligan Plains east” routes would be better alternatives. The mining company has informed the road commission that it will not fund other alternatives. Some would refer to this as blackmail or at least playing hard ball with public funds.

The Marquette County Road Commission cannot keep up with the maintenance of the roads it is already charged with maintaining. Our roads and bridges are in increasingly dangerous conditions. Kennecott/Rio Tinto are obviously financially equipped to pay for this road and they need to apply for a permit to build it under the state’s mining laws and part 632. Having a government entity run interference for a foreign (or any for that matter) economic interest by filing for a permit in the public name sets an extremely bad and dangerous precedent. This action would imperil the taxpaying citizens with potential needless and reckless liability.

The scientific reasons for supporting the EPA objections are enormous. The fragmentation of wildlife corridors and wetland disturbance would decimate this area to such an extent that environmental and economic remediation would be virtually impossible to achieve. Invasive species brought in by construction activities would wreak havoc on the ecosystem. The accumulative effects of building such a route would be enormous and have not been addressed in

the permit. The last amendment filing to the permit, which proposed to preserve 650 acres of wetland adjacent to the McCormick Wilderness Area, was presented the day before the August 28th hearings and the public did not have ample time to review it for the purpose of adding thoughtful and intelligent comment. This is but another example of the lack of integrity our elected and appointed officials have demonstrated in this matter. In another example, Deb Pellow (Marquette County Board Chair) submitted over 1,000 citizen signatures opposing the use of County Roads 550/510. I was one of the key persons who formed the 550/510 Coalition that collected those signatures. This was done before the original permit was granted. The Marquette County Board refused to support those signatures and went on to support the transportation plan for using AAA, 550, 510. Using those signatures now as evidence purporting support for 595 is deceitful. Opposing the 550 route does mean support for the 595 route. There are better alternatives.

In summary, I support the objections that EPA region-5 has raised to the permitting of 595. You have ample and well-founded reasons for your objections based upon both common sense and scientific data. I hope that Region 5 sticks to their objections and does not succumb to the political pressures brought to bear by those with limited interests and foresight.

Respectfully.

Gene Champagne
cjcgmc9@aol.com
906.250-2140

cc: Tinka Hyde
Melanie Haveman